

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HUGHES RIVER FM, LLC,
a Delaware limited liability company,

Plaintiff,

-against-

XIMALAYA, INC.,
a Cayman Islands corporation,
YU JIANJUN, *an individual,*
SEAMAN YU, *an individual,*
XIAOYU CHEN, *an individual,*
LI HAIBO, *an individual,*
and TENCENT MUSIC ENTERTAINMENT
GROUP, INC., *a Cayman Islands*
corporation,

Defendants.

Civil Case No. 1:25-cv-06217

Hon. Edmond E. Chang

**MOTION TO EXTEND PAGE LIMIT
FOR DEFENDANTS YU JIANJUN, SEAMAN YU (DUPLICATE OF YU JIANJUN),
XIAOYU [SIC] CHEN, AND LI HAIBO'S
MOTION TO DISMISS**

Defendants Yu Jianjun, Seaman Yu (duplicate of Yu Jianjun), Xiaoyu [*sic*] Chen, and Li Haibo (collectively, the “**Individual Defendants**”), move this Court for an order granting them leave to file a Memorandum in Support of their Motion to Dismiss in excess of fifteen pages, pursuant to Local Rule 7.1. In support of their motion, the Individual Defendants state as follows:

1. Pursuant to this Court’s Minute Entry dated July 28, 2025, the Individual Defendants’ response to the Amended Complaint in this matter is due today, August 27, 2025.

[DE 41]

2. The Individual Defendants will move to dismiss the Amended Complaint pursuant to Federal Rule of Civil Procedure 12(b)(2), 12(b)(4), 12(b)(5), and 12(b)(6), and are finalizing their memorandum of law in support.

3. To properly address all issues present in the eight count, 33-page, 125-paragraph Amended Complaint, and pursuant to Local Rule 7.1, the Individual Defendants respectfully seek leave of court to file a memorandum in support of their motion no longer than 26 pages.

4. The Individual Defendants have attempted to streamline their brief as much as possible, but have been unable to shorten it further than 26 pages without omitting important legal arguments or without failing to address certain facts raised in Plaintiff's Amended Complaint.

WHEREFORE, the Individual Defendants respectfully request leave to file, *instanter*, a memorandum in support of their motion to dismiss the Amended Complaint no longer than 26 pages.

Respectfully submitted,

Dated: August 27, 2025

By: /s/ Todd Gale

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*Counsel for Defendants Ximalaya, Inc., Yu
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Xiaoyu [sic] Chen, asnd Li Haibo*

CERTIFICATE OF SERVICE

I hereby certify that on August 27, 2025, my assistant caused the foregoing to be electronically filed with the Clerk of the Court using the electronic filing system, which will send notification of such filing to all counsel of record at their respective addresses as disclosed on the pleadings.

Dated: August 27, 2025

By: /s/ Todd Gale

Todd Gale